HOLWELL SHUSTER & GOLDBERG IIP

425 Lexington Avenue, 14th Floor New York, New York 10017 Tel: (646) 837-5151 Fax: (646) 837-5150 www.hsgllp.com

Daniel M. Sullivan 646-837-5132 dsullivan@hsgllp.com

March 28, 2019

SUBMITTED VIA ECF

The Honorable Lewis A. Kaplan United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: United States v. David Blaszczak et al., No. 17 Cr. 357 (LAK)

Dear Judge Kaplan:

We write on behalf of Christopher Worrall to respectfully request that Mr. Worrall be permitted to travel to: (1) East Falmouth, Massachusetts to visit family for Easter, from April 18 through April 22; (2) Phoenix, Arizona to attend a conference his wife is attending for work, from May 5 through May 19; and (3) Las Vegas, Nevada to celebrate his wife's birthday, from November 16 through November 20.

We have communicated with Mr. Worrall's pre-trial services officers in the District of Maryland and the Southern District of New York, and the officers do not object to this request. We have alerted the government, which likewise does not object to this request.

Respectfully submitted,

/s/ Daniel M. Sullivan

Daniel M. Sullivan Holwell Shuster & Goldberg LLP 425 Lexington Avenue, 14th Floor New York, NY 10017 dsullivan@hsgllp.com Attorneys for Christopher Worrall

cc (by email): Ian McGinley Joshua Naftalis

Assistant United States Attorneys

Scott Holtzer

Francesca Tessier-Miller Pre-Trial Services Officers